

Valli Kane & Vagnini

EMPLOYEE RIGHTS ATTORNEYS

600 Old Country Road
Suite 519
Garden City, NY

Tel: (516) 203-7180
Fax: (516) 706-0248
www.vkvlawyers.co

July 23, 2021

VIA ECF

The Honorable Sanket J. Bulsara
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Macas v. Alex's Auto Body 1 Inc. et ano.* -
Case No.: 1:18-CV-07184 (RJD)(SJB)**

Dear Judge Bulsara:

As you are aware, we represent Plaintiff Freddy V. Macas ("Plaintiff") in the above-referenced matter. We write to respectfully request an extension of time to submit the parties' joint motion for settlement approval as well as a conference with the Court to address an unexpected and unanticipated issue that has arisen with the proposed settlement agreement.

Pursuant to II(A) of this Court's Individual Practices, Plaintiff submits that: (i) the original date to submit the joint motion was July 16, 2021, and the proposed new date is Friday, July 30, 2021 (assuming we can conference with the Court and resolve the issue before that time); (ii) the reason for the requested extension is because an issue has arisen regarding the carve-out in the settlement agreement concerning Plaintiff's existing workers' compensation claims; and (iii) the application is submitted on consent. This is the second request for an extension of time related to the parties' joint letter motion for settlement approval.

Accordingly, Plaintiff respectfully submits that there is good cause for the requested extension of time and thanks the Court for its time, attention, and anticipated courtesies in this case.

Respectfully submitted,

VALLI KANE & VAGNINI LLP
/s/ Robert R. Barravecchio
Robert R. Barravecchio

cc: Counsel (via ECF)